U.S. Serial No. 10/784,642 Amendment and Response to Office Action dated 05/16/06 Page 9 of 13

# AMENDMENT OF THE DRAWINGS

A replacement sheet for Figure 1 is attached that includes the designation "Prior Art" in the legend.

Attachment:

Replacement Sheet

#### REMARKS

In response to the non-final Office Action mailed May 16, 2006, the Attorney for the Assignee submits the appended amendments and remarks. Claims 2, 3, 13, and 14 have been cancelled and claims 1, 4-6, 11, 15, 18, 21, 22, 24 and 25 have been amended. No new matter has been added. Upon entry of the present amendment, claims 1, 4-12, and 15-25 will be pending in the present application. The Applicants kindly request allowance of the pending claims.

## I. Drawings

The Examiner objected to Figure 1, because it did not include the term "Prior Art" in the legend. Figure 1 has been amended to include "Prior Art" in the legend. A replacement sheet for Figure 1 is attached.

### II. Claim Rejection – 35 U.S.C. § 112

The Examiner rejected claim 21 under 35 U.S.C. § 112 as being indefinite. Claim 21 has been amended to overcome this rejection. Applicants respectfully request withdrawal of this rejection.

### III. Claim Rejections – 35 U.S.C. § 103(a)

The Examiner rejected claims 1-25 under 35 U.S.C. § 103(a) as being unpatentable in view of U.S. Patent no. 5,330,118 ("Yoshikawa"). The Examiner has not established a *prima* facie case of obviousness for the pending claims as amended. To establish a *prima facie* case of obviousness, the Examiner must show that: (1) there is some suggestion or motivation to one of

ordinary skill in the art to combine the teachings of the references; (2) there is a reasonable expectation of success; and (3) the references teach or suggest all of the claimed limitations. M.P.E.P. § 2142.

Yoshikawa does not disclose or suggest all of the claimed elements. Yoshikawa describes a system in which tape is being added or removed from a roll radius that increases on one reel while decreasing on the other. With Yoshikawa, the tension on the tape between the feed and take-up reels must be controlled by the feed and take-up reel motors to avoid tape damage. Yoshikawa discloses that that supply or feed motor torque is used to control the tension of the tape. See, e.g., col. 2 line 36-39; col. 3 line 5-11; and col. 3 line 17-23. Given that the supply and take-up reel motors must control tension on the tape, Yoshikawa uses derived expressions that define required torque. See, e.g., col. 5, exp. 4 and col. 6, exp. 5. Yoshikawa simplifies the control system by defining a coefficient (see, e.g., col. 6, exp. 6) for which this can be approximated based on radius of the reel (see, e.g., Fig 23).

The present application differs from Yoshikawa in that the present application relates to methods and systems for a no-rewind film transport system. The present invention relates to the control of the supply platter speed (not supply platter motor torque as disclosed by Yoshikawa) to ensure film is paid out at the correct rate. Moreover, the present invention utilizes the relationship between a supply platter where film is being removed from a film roll's inner radius and a take-up platter where film is being added to a film roll's outer radius to control the speed of the supply platter. This relationship is expressed as a transfer function or ratio of take-up platter

angular speed over the required supply platter angular speed and is used to achieve stable control of the supply platter.

Specifically, amended claim 1 includes "processing the take-up platter control signal information based at least in part on a transfer function to produce processed take-up platter control signal information, wherein the transfer function is a ratio of angular speed of a take-up platter and required angular speed of a supply platter; and controlling the supply platter motor based at least in part on the processed take-up platter control signal information" Amended claims 11 and 25 contain similar elements. These elements are not disclosed or suggested by Yoshikawa and, thus, Yoshikawa does not disclose each and every element of claims 1, 11 and 25. As such, claims 1, 11, and 25 are patentable over Yoshikawa.

Because claims 4-9, and 21 and 12, 15-20, and 22-24 depend from claims 1 and 23 respectively, claims 4-9, 12, and 15-24 are patentable over Yoshikawa for at least the same reasons.

With respect to claim 10, Yoshikawa does not disclose or suggest inter alia "determining a corrected supply platter speed control signal based at least in part on the speed error signal and the supply platter reference speed signal" as claimed in claim 10. As such, Yoshikawa does not disclose or suggest all elements of claim 10 and, thus, claim 10 is patentable over Yoshikawa.

Therefore, Applicants respectfully request that the Examiner withdraw the rejection of claims 1, 4-12, and 15-25.

### **CONCLUSION**

The Applicants believes that the present application is in condition for allowance and a Notice of Allowance should be timely issued. If the Examiner believes that there are any issues that can be resolved by a telephone conference, or that there are any informalities that can be corrected by an amendment, please telephone the undersigned at 404-815-6061.

Respectf/ll/ sylbmitted

Michael J. Turton Reg. No. 40,852

KILPATRICK STOCKTON LLP 1100 Peachtree Street Suite 2800 Atlanta, Georgia 30309-4530 (404) 815-6061